

Patricia S. Waldeck, Nev. Bar No. 2640  
777 N. Rainbow Blvd., Suite 270-S  
Las Vegas, NV 89107  
Telephone: (702) 658-6100  
Facsimile: (702) 658-2502  
pswaldeck@cs.com

Kirsten G. Scott, Cal. Bar. No. 253464 (*Admitted Pro Hac Vice*)  
RENAKER HASSELMAN SCOTT LLP  
235 Montgomery St., Suite 944  
San Francisco, CA 94104  
Telephone: (415) 653-1733  
Facsimile: (415) 727-5079  
kirsten@renakerhasselman.com

*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JOHN SIMMONS, SR.,

Plaintiff,

vs.

VERIZON MANAGEMENT PENSION PLAN,

Defendants.

Case No. 2:16-CV-00455-GMN-GWF

**JOINT STATUS REPORT REGARDING  
SETTLEMENT**

On December 22, 2016, following a Settlement Conference with Magistrate Judge George Foley, Jr., Plaintiff John Simmons, Sr. ("Simmons") and Defendant Verizon Management Pension Plan ("Plan"), reached agreement on a dollar amount to settle all claims and causes of action in the above-referenced action. Counsel for the Plan indicated that she would send a draft settlement agreement for Simmons' review.

On January 13, 2017, the Plan provided Simmons with a draft agreement. After some

discussion and edits to the content of the agreement, Simmons and his counsel provided a signed and notarized copy of the agreement on January 25, 2017.

Per the terms of the agreement, the Plan will now send Simmons a pension election form, and following return of that document, the Plan will provide to Simmons the agreed-upon settlement amount. The Plan estimates that this can be completed promptly. It is important to Simmons that he receive the agreed-upon settlement payment before dismissing this case.

For these reasons, the parties respectfully request that the Court extend the current deadline to file dismissal documents from January 30, 2017 to **February 17, 2017**, by which time the parties shall dismiss the case, or file a joint case management conference statement explaining why the case has not been dismissed.

Dated: January 26, 2017

Respectfully submitted,

RENAKER HASSELMAN SCOTT LLP

By: /s/ Kirsten Scott

Kirsten Scott

*Attorneys for Plaintiff*

Dated: January 26, 2017

Respectfully submitted,

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Ann-Martha Andrews

Ann-Martha Andrews

*Attorneys for Defendant*

### **ORDER**

**IT IS HEREBY ORDERED** that the deadline to file dismissal documents or a joint status report explaining why dismissal documents have not been filed is extended to February 17, 2017.

  
UNITED STATES DISTRICT JUDGE

**DATED** this 31 day of January, 2017.